

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
MARISSA LOUISE MCCOOEY	:	
Debtor	:	CHAPTER 13
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	CASE NO. 5-25-bk-01052
	:	
MARISSA LOUISE MCCOOEY	:	
Respondent	:	

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 19<sup>th</sup> day of May 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Failure to properly state the liquidation value in Section 1B of the Plan.
2. Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
  - a. The Plan is underfunded relative to claims to be paid – 100%.

WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s)' Plan.
- b. Dismiss or convert Debtor(s)' case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 19<sup>th</sup> day of May 2025 I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the Unites States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

VINCENT RUBINO, ESQUIRE  
712 MONROE STREET  
P.O. BOX 511  
STROUDSBURG, PA 18360-0511

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee